

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,  
a foreign corporation,

Plaintiff/Counter-Defendant,

vs

Case: 2:11-cv-12422-AC-MKM  
Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,  
MONICA LYNN LUPILOFF, NICOLE RENEE  
LUPILOFF and NICOLE RENEE LUPILOFF  
PERSONAL REPRESENTATIVE OF THE ESTATE  
OF GARY LUPILOFF, DECEASED,

Defendants,

and

MONICA LYNN LUPILOFF, NICOLE RENEE  
LUPILOFF and NICOLE RENEE LUPILOFF  
PERSONAL REPRESENTATIVE OF THE ESTATE  
OF GARY LUPILOFF, DECEASED,

Defendants/Counter-Plaintiffs/Cross-Plaintiffs,

vs

WILLIAM KEENE, JENNIFER KEENE,  
individually, jointly and severally,

Defendants/Cross-Defendants.

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Michael F. Schmidt (P25213)  
Attorney for Plaintiff  
1050 Wilshire Dr, Ste 320  
Troy MI 48084  
248 649-7800

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Albert L. Holtz (P15088)  
ALBERT L. HOLTZ, P.C.  
Attorney for Monica Lupiloff, Nicole  
Lupiloff and Nicole Lupiloff,  
Personal Representative of the  
Estate of Gary Lupiloff, deceased  
248 593-5000

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**CROSS-PLAINTIFFS' RESPONSE TO CROSS-DEFENDANTS,  
WILLIAM KEENE AND JENNIFER KEENE'S, AFFIRMATIVE DEFENSES**

**PROOF OF SERVICE**

NOW COME the Defendants/Cross-Plaintiffs herein, Monica Lynn Lupiloff, Nicole Renee Lupiloff and Nicole Renee Lupiloff Personal Representative of the Estate of Gary Lupiloff, Deceased, by their attorney, ALBERT L. HOLTZ, P.C., and in response to Cross-Defendants, William Keene and Jennifer Keene's, Affirmative Defenses state as follows:

1. Denied.

2. Denied.

3. Denied.

4. Denied.

5. Denied.

ALBERT L. HOLTZ, P.C.

Dated: 21 July 2011

/s/ Albert L. Holtz

**CERTIFICATE OF SERVICE**

LYNN PARSONS does hereby affirmatively state that on 7/21/11 she electronically filed the foregoing and this Proof of Service with the Clerk of the Court using Wiznet E-File & Serve system which will effectuate service upon all counsel of record.

/s/ Lynn Parsons